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Attorneys for Defendants

FARMERS GROUP, INC., FARMERS INSURANCE EXCHANGE,
and 21st CENTURY INSURANCE COMPANY

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

RONALD STALLONE, on behalf of himself
and all other persons similarly situated,

Plaintiff,

v.

FARMERS GROUP, INC., a Nevada
Corporation; FARMERS INSURANCE
EXCHANGE; and 21st CENTURY
INSURANCE COMPANY,

Defendants.

Case No. 2:21-cv-01659-GMN-MDC

**STIPULATION AND ORDER TO STAY
ALL DEADLINES TO FINALIZE
SETTLEMENT**

SECOND REQUEST

STIPULATION AND ORDER TO
STAY ALL DEADLINES TO
FINALIZE SETTLEMENT

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Pursuant to the Court's April 6, 2024 order, ECF No. 82, Plaintiff Ronald Stallone ("Plaintiff") and Defendants Farmers Group, Inc., Farmers Insurance Exchange, and 21st Century Insurance Company ("Defendants") (collectively, the "Parties") hereby provide the following joint status report:

The Parties have been working cooperatively on a settlement agreement, which they anticipate executing in the coming days. Accordingly, to conserve the Parties' and the Court's resources, to promote judicial economy, and to allow the Parties to finalize the resolution of this matter, the Parties respectfully request that the Court ~~stay~~^{vacate} all deadlines, including the deadlines set forth in Court's Order granting the Parties' Stipulation for Extension of Case Deadlines (ECF No. 76), for 45 days to allow the Parties to (1) finalize a formal settlement agreement, (2) complete the steps set forth in the settlement agreement (e.g., exchange W-9s, obtain the necessary signatures, make the settlement payment), and file the notice of dismissal.

Subject to the Court's approval, in the unlikely event the Parties do not finalize a formal settlement agreement within 45 days, the Parties propose they file a status report within 45 days of the date of this order, which will address the status of the Parties' negotiations and potential ///

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STIPULATION AND ORDER TO
STAY ALL DEADLINES TO
FINALIZE SETTLEMENT - 1

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adjustments to the case schedule, including an amended proposed discovery plan and scheduling order.

Respectfully submitted this 6th day of May, 2024.

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IT IS SO ORDERED.

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Attorneys for Defendants

FARMERS GROUP, INC., FARMERS

INSURANCE EXCHANGE, AND 21st

CENTURY INSURANCE COMPANY

IT IS SO ORDERED that all pending deadlines are vacated but a Joint Status Report is due in 45 days of this Order.


U.S. DISTRICT COURT JUDGE

STIPULATION AND ORDER TO
STAY ALL DEADLINES TO
FINALIZE SETTLEMENT - 2

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